PSJ3 Exhibit 541

Agenda

- Know Your Customer (KYC)
- Electronic Monitoring
- Early Dialogue
- Threshold Events
- Review Process

Confidential & Privileged: Joint Defense Information

Cardinal Health

Know Your Customer (KYC)

- Know Your Customer (KYC) Process by which to better know our customers
- Collection and analysis of store specific information. This
 information allows Cardinal Health to complete an appropriate
 assessment (and validation) of relevant facts to ensure that buying
 patterns are appropriately aligned with a customer's business
 model.
 - KYC information to provide for each store on a quarterly* basis includes:
 - · 24 hour store
 - · Prescriptions, on average, filled per day
 - · Automated filling and/or dispensing machines
 - · Percentage of payment methods
 - If the store services hospice, long-term care facilities, pain management, and/or weight management clinics
 - · Percentage of prescriptions filled for controlled substances
 - Monthly dispense utilization

* Providing KYC information in advance would reduce the information needed at the time of a threshold event and expedite the review process.

Confidential & Privileged: Joint Defense Information

2



Threshold Limits

- Electronic Monitoring Systemic process prior to order fulfillment to identify orders of unusual size, frequency, and/or pattern
 - Electronic Monitoring program includes:
 - Monthly accrual of dosage units ordered by drug families
 - · Threshold limits or quantity caps to hold and review orders
 - · Accrual completed by DEA number of CVS store
- Statistical approach used to establish threshold limits
 - Usual order pattern is determined for CVS stores collectively
 - Standard deviation is measured and used to formulate threshold limit
 - Additional data about stores improves methodology and removes inaccurate generalizations; facilitates establishing more accurate threshold limits

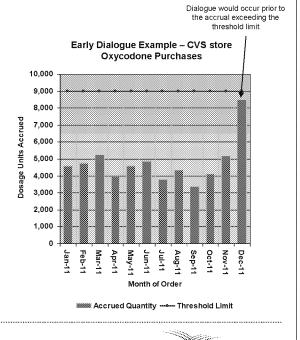
Confidential & Privileged: Joint Defense Information

3



Early Dialogue

- Identification of a store when their electronic monitoring accrual approaches 75% of the corresponding threshold limit
 - Prior to orders being held
- Cardinal Health would proactively notify CVS (Karen Gibbs) that the store is approaching their threshold limit
- CVS would provide information specific to the store's buying pattern
 - What is changing at the store (provide detailed explanation)?
- Potentially avoid interruption to legitimate supply



Confidential & Privileged: Joint Defense Information

© Copyright 2011, Cardinal Health, Inc. or one of its subsidiaries. All rights reserved

Cardinal Health

CONFIDENTIAL

Threshold Event

- When a store's accrual exceeds the corresponding threshold limit, the order is held and routed to Corporate Quality & Regulatory Affairs (QRA) for review.
- When an order is held (i.e. threshold event), Cardinal Health can process the held order one of two ways.

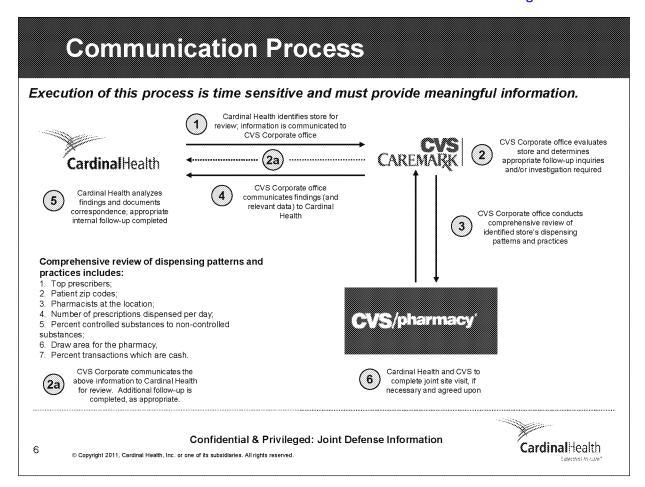
Additional information is provided	Additional information is NOT provided
Obtain additional information from CVS and complete a detailed review. At the conclusion of the review, if appropriate, the order will be released and shipped to the CVS store. Depending on the set of circumstances, and data provided, the threshold limit may be adjusted as well.	Cut (not ship) the order and report to the DEA as suspicious.

Additional information is to be provided within five business days upon request. The order will remain held during the aforementioned five business days. Generally, if additional information is not provided within five business days, the order will be cut and reported to the DEA as suspicious.

Confidential & Privileged: Joint Defense Information

5





CONFIDENTIAL CAH_MDL2804_02299961

CVS Store SOM Review Process

The depth of review required, and corresponding depth of data needed, increases in direct correlation to the quantity of Oxycodone purchased.

Quantity (dosage units) of Oxycodone purchased in a month

0 to 25K



CVS store exceeds threshold limit

CVS completes Cardinal Health's Know Your Customer (KYC) questionnaire. Cardinal Health will review the questionnaire and evaluate the held order. The threshold limit may be adjusted too. 35K to 50K



CVS store purchases between 35K and 50K dosage units

CVS to provide electronic data for Cardinal Health to complete independent review. This data includes:

- Top prescribers;
 Patient zip codes;
- Number of prescriptions dispensed per day;
 Percent controlled substances to non
 - controlled substances;
 5. Draw area for the pharmacy;
 6. Percent transactions which are cash.

> 50K



CVS store purchases more than 50K

CVS to complete an audit of the CVS store and send report to Cardinal Health. The report should provide detail regarding the findings from the audit, underlying reasons for the quantity purchased, as well as projected quantity to be purchased during the upcoming weeks/months.



When agreed to by both parties, CVS and Cardinal Health to complete joint audit of store

Confidential & Privileged: Joint Defense Information

7 © Copyright 2011, Cardinal Health, Inc. or one of its subsidiaries. All rights reserved

Cardinal Health

CONFIDENTIAL

^{*} There may be occasions where Cardinal Health will request additional data or ask additional questions. These instances will be scenario specific.